



U.S. DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Admin.

National Ocean Service

Office of Ocean Resource Conservation and Assessment

Hazardous Materials Response and Assessment Division

c/o EPA Office of Site Remediation and Restoration (HIO)

1 Congress Street

Boston, MA 02114

4 April 2002

Ms. Kymberlee Keckler
U.S. EPA Waste Management Division
1 Congress Street
Boston, MA 02114

Mr. James Shafer
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Dear Kymberlee/Jim:

Thank you for the Draft Final Feasibility Study for Soil and Marine Sediment at the Old Fire Fighting Training Area, Naval Station Newport, Newport, Rhode Island, prepared by Tetra Tech, NUS, Inc., March 2002. As before, NOAA's interest relates to the development of sediment remedial actions. Previously, NOAA reviewed the draft of this document in May of 2001 and the related Draft Sediment Predesign Investigation in March of 2002. Although specific NOAA comments from the draft FS were addressed by the Navy in their Response to Comments, the actual locations for potential remediation remains unclear because of regulatory and technical indecision. Especially, as requested in May of 2001, the eelgrass area that requires further serious discussion not further letter writing. I would recommend a presentation by the Navy outlining the area where the sediment exceeds the PRGs and the benefits and drawbacks of the options may be discussed. We can then hopefully reach agreement on the necessary remedial action.

NOAA was pleased to note the improved Figures given the availability of the new data from the Draft Predesign Investigation. In addition, the final draft now includes more sediment contaminants of concern (Table 2-13); that was an original NOAA comment. We questioned why flouranthene was not included here and were provided a reason in the Response to Comments. But now flouranthene among seven other PAH compounds are included. Please explain.

In Table 2-14 the PRGs Based on Ecological Risk generally increased when compared to last year's draft document. The PRG was eliminated for benzo(a)pyrene and benzo(g,h,i)perylene but dibenzo(a,h)anthracene was included. Please explain. We also note some differences in Table 2-15, which selects the sediment CoCs, but are uncertain why the concentrations and list of chemicals changed. Appendix D, PRG Development for Sediment, did not help us answer these questions.

NOAA remains committed to assist the Navy and EPA in reaching consensus to select a remedial alternative in the intertidal and offshore of the OFFTA. Please let me know if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'KF', with a long horizontal stroke extending to the right.

Kenneth Finkelstein, Ph.D.

CC; Bart Hoskins (EPA)